



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 12, 2016

Abigail T.D. Wacek
Regulatory Consultant
Agent for King Technology, Inc.
Technology Sciences Group Inc.
1150 18th Street, NW, Suite 1000
Washington, DC 20036

Subject: Label Amendment –to update the reference statement and optional label claims
Product Name: SPA BROMINE DISINFECTANT
Prefilled Bromine {Spa} Sanitizer
EPA Registration Number: 53735-10
Application Date: June 7, 2016
Decision Number: 518673

Dear Ms. Wacek:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

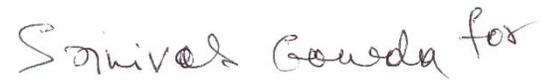
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Srinivas Gowda by phone at 703-308-6354, or via email at gowda.srinivas@epa.gov.

Sincerely,

Handwritten signature in cursive script that reads "Srinivas Gowda for".

Demson Fuller
Product Manager – Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: EPA Stamped Label

{All text in brackets [xxx] is optional and may or may not be included on a final label.}

{All text in braces {xxx} is administrative and will not appear on a final label.}

[Alternate Brand Name: Spa Frog Bromine Cartridge]

{MASTER LABEL}

**SPA BROMINE DISINFECTANT
Prefilled Bromine [Spa] Sanitizer**

[For use only in the King Brom Feed System]

[Uniformly feeds bromine]

[Precisely meters bromine]

[Controls the rate of bromine delivery]

[Controls algal, bacterial, and fungal slimes continuously for weeks]

[Never touch the bromine]

[Prefilled for no mess and less odors]

[A MICROBIOCIDAL [BACTERICIDE], [FUNGICIDE], [ALGAECIDE] [AND]
[SLIMICIDE] [FOR TREATING] [RECIRCULATING COOLING WATER IN INDUSTRIAL
COOLING SYSTEM[S] [AND] [INDUSTRIAL ONCE-THROUGH COOLING WATER
SYSTEMS]]

Keep Out of Reach of Children

DANGER

**SEE [FIRST AID AND] PRECAUTIONARY
STATEMENTS ON [BACK] [SIDE] PANELS**

Active Ingredient:

1-Bromo-3-Chloro-5, 5-Dimethylhydantoin.....96.0%

Other Ingredients:..... 4.0%

Total:100.0%

EPA Reg. No.:

53735-10

EPA Est. No.:

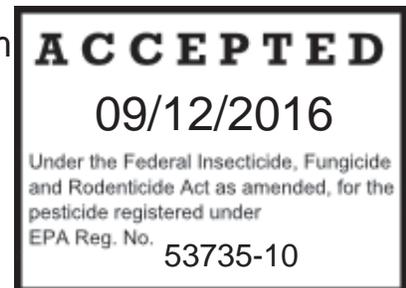
XXXXX-XX-X

Manufactured By:

King Technology, Inc.
530 11th Avenue South
Hopkins, MN 55343
www.KingTechnology.com

Net Wt.:

{as indicated on container}



FIRST AID: If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. If Inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice. If Swallowed: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

IN CASE OF MEDICAL EMERGENCY CALL 1-800-424-9300.

Product Description: {Stand Alone Canister for [Spa] Hot Tub Use} When used as directed SPA BROMINE DISINFECTANT is effective as a residential spa and hot tub water disinfectant.

Directions For Use: {Stand Alone Canister for [Spa] [Hot Tub] Use}

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label to use strictly in accordance with precautionary statements and directions.

Ensure all spa equipment is working properly. Clean filter following manufacturer's directions. Adjust pH between 7.2 – 7.8 and total alkalinity to 80 – 120 ppm. When using other products as outlined in directions for this product, always follow directions on those products.

Place this product in spa and let it float freely in spa or hot tub. Under normal use conditions, use one dispenser per 350 gallons of spa or hot tub water. However, under heavy bather loading or reduced water circulation, additional dispensers may be used to maintain constant active bromine residuals of 2-4 ppm in residential spas or hot tubs. To increase the bromine residual, turn the rotating cap to a higher number located in the flow indicator window. To decrease the bromine residual, turn the rotating cap to a lower number in the flow indicator window.

To a freshly filled spa or hot tub, begin with an indicator setting of # 5. Check bromine residuals frequently. When 2-4 ppm bromine residual is obtained, lower the indicator setting to maintain constant recommended bromine residuals.

The pump and filter should be operated for at least three hours a day. Keep the spa free of leaves and debris. Residential spas and hot tubs should be drained and filled with fresh water periodically. See your spa manufacturer's directions.

Product Description: {Cartridge for System Use in [Spas] [Hot Tubs]} Use the SPA BROMINE DISINFECTANT Cartridge in [either] the Spa Frog Inline System [or Floating System] along with the Spa Frog Mineral Cartridge (EPA Reg. No.: 53735-11) for complete and easy spa care with water that's crystal clear and odor free.

Directions for Use: {Cartridge for System Use in [Spas] [Hot Tubs]} It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label to use strictly in accordance with precautionary statements and directions.

Ensure all spa equipment is working properly. The pump and filter should be operated for at least 3 hours per day. Clean filter following manufacturer's directions. Adjust pH to between 7.2 – 7.8 and total alkalinity to 80 – 120 ppm. When using other products as outlined in directions for this product, always follow directions on those products. [Keep the spa free of leaves and debris.]

{One of the following statements will appear on the label}
[Residential spas and hot tubs should be drained and filled with fresh water periodically. See your spa manufacturer's directions.] [To maintain clear, clean water and ensure performance of your spa or hot tub chemicals, water should be drained and spa or hot tub refilled with fresh water periodically or as per spa manufacturer's instructions.] [Residential spas and hot tubs should be drained and refilled with fresh water every 60 days or as per spa manufacturer's instructions.]

Before using Cartridge: With a freshly filled spa establish a [bromine] [or] [chlorine] residual of 1.0-2.0 ppm with [Frog Jump Start] [an EPA approved spa shock] [or by other means] by following directions on [the package] [that product].

Using the In-line Mineral Spa System: For the first 24 hours, set the SPA BROMINE DISINFECTANT Cartridge at #3 by holding the bottom and turning the top until the number 3 appears in the setting window. To install: open cap of Inline System, push down and turn cartridge holder counter-clockwise to unlock. Pull holder out. Snap cartridge into "Bromine Only" section. Make sure to line up indent on cartridge with raised line on holder. After cartridge is snapped in, replace holder by lining up arrow on holder with arrow on system lip, push down and lock in place. Replace cap. When using as directed with the Spa Frog Mineral Cartridge, maintain at least a 1.0 ppm bromine level. Otherwise maintain a 2.0 – 4.0 ppm bromine level. Initially test water daily and adjust the cartridge up or down depending on spa size and use until desired bromine level is achieved. For best results at measuring low bromine levels, use the Frog Brand Test Strips.

Using the Floating Mineral Spa System: For the first 24 hours, set the SPA BROMINE DISINFECTANT Cartridge at #5 by holding the bottom and turning the top until the number 5 appears in the setting window. To install: push the cartridge into the bottom opening of the Floating Spa System. Set entire system in the spa water. When using as directed with the Spa Frog Mineral Cartridge, maintain at least a 1.0 ppm bromine level. Otherwise maintain a 2.0 – 4.0 ppm bromine level. Initially test water daily and adjust the cartridge up or down depending on spa size and use until desired bromine level is achieved. For best results at measuring low bromine levels, use the

Frog Brand Test Strips.

[Using as a Free Floating Sanitizer: Set cartridge as described for the Floating Spa System and allow to free float in spa. When using it with a Spa Frog mineral product, maintain at least a 1.0 ppm bromine level. When using it as a stand alone disinfectant, maintain a 2.0 – 4.0 ppm bromine level.]

FOR ALL USES: Adjusting to a higher setting will increase the bromine output while a lower setting will decrease it. When empty follow disposal instructions and replace with a new Spa Bromine Disinfectant Cartridge.

[Setting Window]

REENTRY into treated spas is prohibited above levels of 5 ppm available bromine as measured by a suitable test kit due to risk of bodily injury.

{Optional language for 200-gram cartridge}

[For in-Line System Use Only]

[Use this Spa Bromine Disinfectant Cartridge in the In-line Spa System only.]

[DO NOT use this cartridge with the Floating Spa System.]

[Lasts Longer*]

[33% More*]

[33% More Bromine*]

[Bromine Lasts Longer*]

[33% More Bromine Lasts Longer*]

[*compared to the 150 gram Spa Bromine Disinfectant]

Product Description: {Evaporative Cooler}. When used as directed, this product effectively controls algal, bacterial and fungal slimes in evaporative coolers.

Directions for Use: {Evaporative Cooler} It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label to use strictly in accordance with precautionary statements and directions.

Shut off water to evaporative cooler. Secure new Bromine Disinfectant Cartridge to water supply line leaving the preset output window at setting #1. Make sure the water supply is attached at the top of the Bromine Disinfectant Cartridge and that both water delivery lines are attached at the base of the container. Turn water on and ensure there are no leaks.

Maintain a 1-3 ppm bromine residual for at least four hours treatment. Repeat throughout the cooling season. A new Bromine Disinfectant Cartridge should be inserted at the beginning of the cooling season and replaced when empty thereafter. See Evaporative Cooler manufacturer's directions on adjusting amount of drainage water and water cycle times for the Evaporative Cooler.

Product Description: {Cooling Water Systems}

[Industrial Recirculating Cooling Water Systems]

[This [cartridge] [chamber] [pac] [pack] is part of an advanced system that uniformly feeds bromine to achieve one part per million (ppm) to effectively control algal, bacterial, and fungal slimes in commercial and industrial cooling towers; influent water systems such as flow-through filters, cooling ponds, canals and lagoons; heat exchange water systems; industrial water scrubbing systems; brewery and canning pasteurizers and industrial air washing systems equipped with a mist eliminator. The conveniently disposable [cartridge] [chamber] [pac] [pack] lets you control the rate of bromine delivery by simply adjusting the control dial on the King Brom Feed System. [You never have to touch the bromine.]]

[Once-through Industrial Cooling Water Systems]

[This [cartridge] [chamber] [pac] [pack] is part of an advanced system that uniformly feeds bromine to achieve one part per million (ppm) to effectively control algal, bacterial, and fungal slimes in once-through and closed-cycle fresh and sea water cooling systems, cooling ponds, canals, and lagoons. The conveniently disposable [cartridge] [chamber] [pac] [pack] lets you control the rate of bromine delivery by simply adjusting the control dial on the bromine delivery system. [You never have to touch the bromine.]]

DIRECTIONS FOR USE:

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

1. This [cartridge] [chamber] [pac] [pack] is for use only in the King Brom Feed System.
2. To install [cartridge] [chamber] [pac] [pack]: Take feeder cap off. Remove [cartridge] [chamber] [pac] [pack] [colored caps] [cut offs]. Hold [cartridge] [chamber] [pac] [pack] so the open end faces down. Insert into feeder. The end of the [cartridge] [chamber] [pac] [pack] must align with the key located inside the feeder at the bottom. **DO NOT FORCE.** Replace feeder cap and set the control dial to the appropriate setting.
3. Set control dial to setting #xx. Check the bromine residual and increase/decrease as needed to achieve 1.0 ppm for at least 4 hours or desired ppm.
4. Periodically check the [cartridge] [chamber] [pac] [pack] and replace with a new one when empty. Do not attempt to open or refill this [cartridge] [chamber] [pac] [pack]. **DO NOT REUSE.**

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: DANGER: Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed. Irritating to nose and throat. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Wear protective clothing and rubber gloves when handling product. Avoid breathing dust and fumes. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Follow directions for use carefully.

PHYSICAL AND CHEMICAL HAZARDS: STRONG OXIDIZING AGENT: [Non-refillable container. Do not attempt to refill empty [cartridge] [chamber] [pac] [pack].] Do not mix with other chemicals. Mix only with water. Never add water to product. Always add product to large quantities of water. Use clean dry utensils. Do not add this product to any dispensing device containing remnants of any other product. Such use may cause a violent reaction leading to fire and explosion. Contamination with moisture, organic matter or other chemicals will start a chemical reaction and generate heat, hazardous gas, possible fire and explosion. In case of contamination or decomposition, do not reseal container. If possible, isolate container in open air or well ventilated area. Flood area with large volumes of water.

{Environmental hazards statement for end-use products of less than 50 pounds (solid, dry weight).}

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms.

STORAGE AND DISPOSAL:

Do not contaminate food or feed with this product.

Storage: Store [cartridge] [chamber] [pac] [pack] [product] in original container in a cold, dry, well ventilated area away from heat or open flame. In case of decomposition, isolate container if possible and flood area with large amounts of water to dissolve material before discarding this container.

{Disposal directions for Canister and Cartridge used in [Spas] [Hot Tubs]}

Pesticide Disposal: Product or rinsates that cannot be used must be diluted with water before disposal in a sanitary sewer.

{Disposal directions for Cooling Water Systems}

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling: Non-refillable container. Do not reuse or refill this [container] [cartridge] [chamber] [pac] [pack]. Offer for recycling if available. Rinse thoroughly before recycling or discarding in trash.

{Clear Child Resistant Outer Sleeve}

EASY DIRECTIONS: {Canister}

- 1) Twist cap to setting #5.
- 2) Put chemical dispenser in spa water.
- 3) Test bromine residual frequently (approx. every 2 hours).
- 4) Upon achieving 2-4 ppm REDUCE TO MAINTENANCE SETTING #1-#2 for maximum longevity.

TO ADJUST SETTING: {Canister}

- 1) For ease of adjustment place in water.
- 2) Grip cap firmly in one hand.
- 3) With other hand, grip below windows firmly. (Fingers should grip only bottom of canister.)
- 4) Turn cap and outer sleeve in opposite directions.

{Optional copy for labels}

[IMPORTANT:

The warranty will be void if this [cartridge] [chamber] [pac] [pack] is not used with the appropriate feeder. Fire or explosion may result if this [cartridge] [chamber] [pac] [pack] is used with an incorrect chemical feeder.]

[NOTE: Some settling may occur during shipment.]

[Note: Buyer assumes all responsibility for safety and use not in accordance with directions.]

[DO NOT REMOVE LABEL]

[IN CASE OF MEDICAL EMERGENCY CALL 1-800-424-9300]

[NPTN Hotline number for public information 1-800-858-7378]

[Patents: www.KingTechnology.com/IP]

{All text on this page is optional for marketing in conjunction with the POOL FROG Mineral Reservoir 53735-11}

Spa Frog Floating System+

+FROG Mineral System consists of the FROG minerals silver chloride and carbonate used in conjunction with 1.0 ppm bromine. SPA FROG Mineral Cartridge [EPA Reg. No. 53735-11] must be used in conjunction with the SPA FROG Bromine Cartridge [EPA Reg. No. 53735-11], an EPA registered bromine or chlorine spa product or a chlorine delivery device.

Adopt a FROG for Worry Free Water

Less work with no daily dosing

Reduce bromine use up to 50%*

*Compared to the minimum ANSI recommended bromine level of 2.0 in a spa

Adopt an easier, more fun spa environment

Mineral Cartridge must be replaced every 4 months

Note: You may still feel the “spent” minerals inside, but they are no longer effective and need to be replaced. Simply discard in trash

Open for carrying handle

Free FROG Jump Start Shock Inside

Free FROG Test Strips Inside

Spa FROG In-Line System

Spa FROG Mineral and Bromine Spa Care

Experience the FROG Difference

Enjoy clearer, cleaner spa water with the help of minerals

Soft feeling water that’s easier on your skin

Reduces faded swimsuits and smelly odors

[FROG offers more fun –] relaxation and peace of mind

Easy Top Loading Cartridges, Bromine Cartridge [lasts 2-4 weeks], Mineral Cartridge [lasts 4 months],

Floating [Holder] [System]

Mineral Hybrid Water Care

Side flap goes inside of box

Center flap goes outside of box

200 Gram Bromine Cartridges for the Spa FROG In-Line System Only!

Ask your dealer if your spa came with a Spa FROG In-Line System

Less bromine with minerals helping to control bacteria

Less work with pre-filled disposable cartridges

200 gram Bromine Cartridge for longer life

33% more Bromine[^]

[^]Compared to the 150 gram bromine [cartridge]

For use in the Spa FROG In-Line System [only] [for Caldera Spas]

Fit’s Caldera Spas

{All text on this page is optional for marketing in conjunction with the POOL FROG Mineral Reservoir 53735-11}

[Start-up] [Maintenance] [Kit] For [Spas] [Hot Tubs]
Fresh Mineral Water with Bromine

An innovative slow-dissolving mineral system that destroys bacteria while using less bromine – creating cleaner, clearer and softer water

Fresh Mineral Water Easy - A [proprietary] [innovative] [exclusive] water care solution from FROG that delivers 4 primary advantages

- CLEANER means it kills bacteria 2 ways – with minerals and a low level of bromine
- Minerals help keep the pH balanced for CLEARER water that shines
- Minerals condition the water for SOFTER effects
- Cartridges are prefilled for no mess, no guess, no stress. Making maintenance – EASIER

Bromine slowly dissolves in hot water for less odors
Works effectively in a wide range of pH with less monitoring
Regenerates itself with a chlorine or non-chlorine shock

Adjustable cartridges for precise output that lasts for weeks
Bromine use is reduce by up to 50% with FROG minerals

Fresh Mineral Water Cartridge [lasts 4 months], Bromine Cartridge [lasts 2-4 weeks], Cartridge Holder

[Contains] 1 Fresh Mineral Water Cartridge, # Bromine Cartridge[s], # FROG Test Strips, # FROG Jump Start “start-up shock”

Creates Fresh Mineral Water[®] [that’s]

- Cleaner because it kills bacteria two ways
- Clearer because it helps keep pH [in an acceptable range] [balanced]
- Softer because [minerals condition the water for softness] [there’s up to 50% less bromine]
- Easier with pre-filled cartridges for no mess, [no guess, no stress] [or measuring]

Easy [Spa] [Hot Tub] Start-up

FROG Test Strips

- It’s the only strip with the ideal bromine range for FROG [spas] [hot tubs]
- Most test strips show this level as too low causing confusion
- FROG Test Strips help dial in the right setting for your [spa] [hot tub]
- The result: Your Bromine Cartridges will last up to 50% longer
- Using standard test strips can lead to over bromination and wasting money
- Accurately measures the reduced bromine level of 1.0 to 2.0 ppm
- Adjust your cartridge setting to maintain the ideal FROG bromine range
- Get a longer life to your bromine cartridge

FROG Jump Start

- Start-up shock removes contaminants and sets the residual

{All text on this page is optional for marketing in conjunction with the POOL FROG Mineral Reservoir 53735-11}

- Effervescent action helps the chlorine dissolve faster
- Takes the start-up load off the Bromine Cartridge so it lasts longer
- Use when draining and re-filling the [spa] [hot tub] – up to 500 gallons
- Use for easy [spa] [hot tub] start-up

{All text on this page is Optional}

- Oxi-King Water Treatment System
- The precise No Touch Chemical Feeder
- An easy, [consistent] and reliable delivery system that provides simple water treatment [solutions] for industrial and commercial applications.

- Sustainable water treatment solution
- Controls system fouling
- Quick, universal installation works with multiple applications

- Simple. Reliable [consistent] results.
- Consistent, sustainable and reliable results.
- The choice is easy, chose Oxi-King Water treatment system

- [Oxi-King] Saves you valuable time and money
- Easy to use. Easy to transport [carry][handle]
- Saves you valuable time with pre-filled, no touch [Oxi-King] Brom Pacs

- [Significantly] [drastically] reduces [hazardous] bromine dust
- Reduces exposure to [hazardous] bromine dust
- [Easier] [Better] for employees to handle.

- [Better] for the environment. [Better] [Advantageous] for your employees.
- Eliminates the need for Haz-Mat suits.
- Pre-filled bromine pac eliminate hazardous material handling concerns [bromine dust]

- [Unique] [Proprietary] Dust-free packaging [design]
- No risk of liquid spills or splashing
- Reliable: Water cycles through only a small amount of bromine for more uniform and reliable output

- No drum or pail disposal
- Facility-friendly dust free packaging [that has less odors] [that has less odors than traditional sanitizing methods]
- Less odors

- The easier alternative to bulk bromine
- Reduced odors and no touching or measuring bromine
- Saves time – bromine lasts longer

- No hassles – no contact with bromine – the [cartridge] [pac] [chamber] contains the odors
- Facility friendly
- Proprietary solid oxidizing biocide delivery system provides simple water treatment for industrial and commercial applications

- Bromine based chemistry provides broad spectrum microbiological control including Legionella pneumophila
- [Oxi-King Brom Pacs are] 100% recyclable

{All text on this page is Optional}

- Replace Brom Pac when empty
- Open cap and remove empty pac – recycle or dispose in trash
- Remove handle from new Brom Pac with tool provided and insert into system

- Set dial to maintain desired bromine output [level] [levels]
- Bleed air from back knob if more output desired at maximum setting
- [Oxi-King] 5lb [Oxi-King] bromine pac

- While this system limits exposure to chemicals, EPA requirements state you should wear rubber gloves and safety glasses when using this product and avoid breathing in dust or fumes. Wash thoroughly after using this product.